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October 25, 2007

Mr. Sam Chummar, Remedial Project Manager
U.S. Environmental Protection Agency - Region 5
Superfund Division - Remedial Response Branch #1
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Subject: Response to Comments – Telephone Conversation of October 18, 2007 regarding the October 16, 2007 Response to Comments Letter for the *Plainwell Mill Banks Emergency Action Design Report* Plainwell Mill, Operable Unit No. 7, Allied Paper, Inc./Portage Creek/Kalamazoo River Site

Dear Sam:

Attached for your use is a summary of specific responses to the October 18 and 25, 2007 telephone conversations addressing questions to the Response to Comment letter on the *Plainwell Mill Banks Emergency Action Design Report* dated October 16, 2007. These additional changes are noted in the responses to individual comments that we agreed to re-submit. Where possible, we have presented these changes in "red-line" to streamline your review. As we discussed and consistent with the responses to the comments on the Emergency Action Design Report for the 12th Street Landfill Powerhouse Channel, we are requesting that you conditionally approve this letter response dependent upon incorporation of the comments into the Final Design report. The applicable comments will be integrated into the Final Plainwell Mill Banks Emergency Action Design Report to be submitted after your conditional approval of the design activities and concurrently with field work. We are also requesting a formal written approval of the Addended Quality Assurance Project Plan (QAPP) and Field Sampling Plan and acknowledgement of receipt of the final Health and Safety Plan for our records.

As we discussed, the activities described in the Plainwell Mill Banks Emergency Action Design report are being conducted in a manner consistent with applicable provisions of the Settlement Agreement between the Kalamazoo River Study Group, United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) and the associated Former Plainwell Impoundment Time-Critical Removal Action Design Report (Appendix 4 to the Settlement Agreement). Thus the responses in this letter as well as the October 16, 2007 comment response letter reflect our consideration of your comments and incorporation of changes when possible, given the site conditions and time constraints of the Mill bank activities. If changes are not practicable and remain inconsistent with the Plainwell Impoundment TCRA, we have referenced the corresponding section of the Plainwell Impoundment TCRA design report that formed the basis of the work described in the Plainwell Mill Banks Emergency Action approach. If you have additional questions on these responses, please let us know and we can discuss them further.

Comment Letter Dated October 10, 2007

Specific Comments

2. Section 2.1, Page 5, Paragraph 1 - The text references "containment of the visual paper residuals." No details as to the circumstances under which this would occur are included in the text. Additionally, methods by which visual paper residuals are contained are not included in the text. Please provide details to the circumstances under which containment will occur, and also the methodology for containment.

The overall goal of the Emergency Action is to take appropriate action to prevent, abate or minimize a potential release. The primary tactic is focused removal of residuals; however, containment can be

effective in accomplishing this goal as well, and may be necessary, under some conditions. Thus, consistent with the Plainwell Impoundment TCRA Design Report, the Plainwell Banks Emergency Action Design Report includes a contingency for allowing containment should removal not be practicable or feasible. Therefore, the following information will be integrated into Section 2.1 Paragraph 1 :

Specific circumstances as to why excavation would not be feasible will be determined based upon field conditions. In certain locations, the presence of large underground structures may obstruct the removal. In other instances, bank instability or access limitations may limit the ability to safely excavate limited areas of residuals and containment could be the only available option to control potential for releases or future exposure. In other locations, the volume of material targeted for removal may result in upland bank cutbacks that are objectionable to the City of Plainwell and containment offers a more acceptable alternative. These determinations will be made in conjunction with the agency oversight representatives. Containment is expected to consist of placement of 6 inches of clean soil in a manner similar to that proposed in the Plainwell Impoundment TCRA (Section 5.4.3). The soil cover placement is further described in Section 2.3.2 of thise Plainwell Banks Emergency Action Design Report.

6. Section 2.3.2, Page 11, Paragraph 1 - The six inch cover layer, if consisting of soil, should consist of clean soil. Appropriate analytical data should accompany any imported soil.

The following sentence will be added to paragraph 1 after the fourth sentence:

If imported soil is used as cover, one composite sample ~~of the soils per~~ for each 10,000 cubic yards of ~~source are~~ material will be analyzed for PCBs and applicable TAL/TCL parameters as agreed to by USEPA representatives. ~~Measured concentrations of soil constituents~~ Analytial results will be compared to applicable Part 201 soil criteria and Part 213 Risk-based screening levels provided in RRD Operation Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria and RMSLs) issued by MDEQ on December 10, 2004. If there are no exceedances of these criteria, the soil will be considered suitable for cover. Non detected concentrations will be assumed to be below criteria and therefore acceptable.

7. Section 2.3.2, Page 11, Paragraph 2 - Historical data should not be used to verify the cleanliness of soil/sediment. Prior to any re-use of excavated soil/sediment, it should be analytically analyzed and then only determined safe to re-use.

The following sentence will be added as the new last sentence in the paragraph:

If cover soil is required, a composite sample of the soils from the source area will be analyzed for PCBs and applicable TAL/TCL parameters as agreed to by USEPA representatives. ~~Measured concentrations of soil constituents~~Analytical results will be compared to applicable Part 201 soil criteria and Part 213 Risk-based screening levels provided in RRD Operation Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria and RMSLs) issued by MDEQ on December 10, 2004. If there are no exceedances of these criteria, the soil will be considered suitable for cover. Non detected concentrations will be assumed to be below criteria and therefore acceptable.

8. Section 2.3.3, Page 11 - The proposed method for sediment control for sediment excavation activities is the use of vertical silt curtains (the same method currently being used downstream as part of the Plainwell Impoundment TCRA activities). The use of sheet pile with active hydraulic control (i.e., surface water pumped from the removal area) and other sediment controls have been used upstream of the Plainwell Mill (at land based

operable units) with proven success. It is recommended Weyerhaeuser evaluate the effectiveness and feasibility of these options for this emergency action.

Updated response

The main goal of the sediment control system is to minimize downstream transport of resuspended material associated with the removal of targeted sediments and bank soils. Sheet piling with active hydraulic control was determined to not be a cost effective system based on removing the areas by zone, treating all of the drawdown water, timeframe for removal and the need for secondary resuspension control during placement and removal of sheet piles.

The most feasible alternative still appears to be utilizing silt curtains with some additional anchoring as necessary. Based upon the problems encountered during some of the TCRA activities, we anticipate taking two actions. First, we will install shorter sections of silt curtains, especially in river areas with higher velocity. Second, we will anchor the base of the silt curtain by attaching additional chain to the anchor chain to form a ring and drive metal posts through the ring to hold the curtain in place. The silt curtains will be inspected daily prior to start of any excavation and whenever any visible or measured turbidity increases are identified downstream. The curtains will be re-anchored or additional metal posts will be installed if necessary to achieve needed turbidity control.

If turbidity releases are identified, additional actions will be taken to minimize any future release. These may include flow deflectors such as concrete barriers or Portadam type structures deployed upstream as necessary, additional curtains, even more anchoring posts or modification of removal rates and approaches.

9. Section 2.3.3, Page 11 - Does the last sentence in this section indicate the erosion control methods discussed in the text are in general conformance with the MDEQ training manual or that additional soil erosion control methods will be in conformance? If there are additional soil erosion methods, please discuss them in detail.

~~These~~ This sentences will be added: ***Erosion control methods will be in general conformance with the MDEQ Soil Erosion and Sedimentation Control Training Manual.~~ ~~Additional measures not described in the text include protection of storm water inlets and small runoff diversions.***

10. Section 2.4, Page 12 - After the Emergency Action, interim erosion controls will be placed to protect the banks from "moderate stresses." The term "moderate stresses" must be defined.

The term moderate stresses will be eliminated from the final design report. Instead the sentence will be revised as follows: ***In the interim, the banks will be stabilized to limit erosion by re-vegetation and/or placement of well-graded 6-inch D50 river-run stone or similar material ~~as approved by the engineer.~~***

13. Section 3.1, Page 17, Paragraph 2 - It should be specified that the *Multi-Area Field Sampling Plan* and the *Multi-Area Quality Assurance Project Plan,* are being used with site-specific addenda.

The sentence will be modified to read as follows: PCB waster samples will be collected in accordance with the procedures outlined in the ***addended ~~mended~~ Multi-Area*** *Field Sampling Plan(FSP) for the site. Analysis will be performed by Weyerhaeuser Analytical Testing Services...in accordance with the* ***addended ~~mended~~ Multi-Area*** *Quality Assurance Project Plan.*

14. Section 3.2 , Page 17, Paragraph 4 - The U.S. EPA requests monthly reports on the Emergency Action. Additionally, refrain from referring to the Emergency Action as a "removal action," as it is in the second to last sentence of this paragraph.

Monthly progress reports will be provided on the Emergency Action. The seventh sentence in Paragraph 4 will be amended as follows: Monitoring results will be documented in a field notebook and ***validated results*** *will be reported to the agency in* ***monthly progress reports during field activities and in the Mill Banks Emergency Action Documentation Report.*** ~~*and after the completion of the Mill banks residual emergency action.*~~ *Removal action terminology will be replaced with emergency action*

15. Section 3.3 - Implementation of post-excavation sampling (described in the text as documentation sampling) should be consistent with the *MDEQ Sampling Strategies and Statistics Training Materials* (S3TM) after the excavation is performed. The post-excavation sampling plan must also recognize the potential for biased and unbiased sampling strategies. The U.S. EPA and MDEQ are available to assist in developing a compliant sampling strategy.

The sampling described in the Plainwell Banks Emergency Action Design Report is consistent with applicable provisions of the Settlement Agreement and the Former Plainwell Impoundment Time-Critical Removal Action Design Report (Appendix 4 to the Settlement Agreement) and reflect the .MDEQ Sampling Strategies and Statistics Training Materials (S3TM) in a similar manner. In order to implement the Emergency Action and limit potential releases of hazardous wastes during the 2007/2008 winter and spring season, additional changes are not being contemplated at this time. The sampling activities in the Plainwell Impoundment TCRA Design report are presented in Section 5 Environmental Monitoring Plan.

The proposed sampling plan can be adapted for biased sampling if a reliable visible indicator is apparent in the sampled media.

16. Section 3.4, Page 19, Paragraph 3 - Currently, U.S. EPA is not aware of the timeframe in which the City of Plainwell plans to install permanent erosion controls. Please coordinate the restorative efforts and erosion control with the City of Plainwell to ensure the bank areas are protected from erosion and failure until permanent measures are implemented.

Weyerhaeuser and the City of Plainwell are working together to prepare the Mill banks area for a future riverwalk whereby permanent measures will be implemented. ~~*as expeditiously as possible.*~~

19. Figures 4, 5, 6, and 7 - Please include the size and type of the rip-rap.

The Erosion protection measures for each zone are described in detail in Appendix D. The proposed erosion protection rip rap is 6-inch D50 well-graded river run stone which will be noted on Figures D-2, D-3, D-4 and D-5. ~~*show the planned placement location for the rip rap in each zone.*~~

32. Table C-2 - These outfalls are not identified in Figure C-I. Please identify their locations in Figure C-1.

The approximate location of the abandoned ~~*unknown*~~ *outfalls has been added to Figure C-1.*

33. Page D-1, Background and Objectives, Paragraph 2 - Please identify what "moderate stresses" are.

The text will be changed to reflect the response to comment 10: ***In the interim, the banks will be stabilized to limit erosion by re-vegetation and/or placement of well-graded 6-inch D50 river-run stone or similar material.*** ~~***as approved by the engineer.***~~

Comment Letter Dated October 15, 2007

1. The current design of the residual containment pad calls for a 40 mil LLDPE liner between two layers of sand. The USEPA is concerned the 40 mil LLDPE liner could be punctured during operation with this current design. Please consider methods (e.g. adding felt to the top and bottom of the LLDPE liner) to prevent puncture.

   The following information will be added to the description of the residuals containment area(Section 2.2.5)

   The liner will be exposed to some stresses from material placement but not extensive truck traffic. As such, a 40 mil LLDPE liner was specified due to it flexibility under various stresses as well as its strength and durability. The LLDPE liners have the ability to elongate under stress, allowing them to maintain their integrity under localized differential settlement conditions without puncturing, tearing, or cracking. The LLDPE also has a superior resistance to low temperatures and ultraviolet exposure which may be expected at the Plainwell Mill site. However, to provide further protection, up to 12 inches of sand will be placed on top of the liner (below the residuals).

   Once the containment pad area is cleared, RMT will inspect the bottom for suitability to support placement of the liner material. If soft or compressible areas are encountered or there are objects such as concrete or stone which are impractical to remove, the design may be adapted to include placement of a gGeofabric over the existing ground surface prior to placing sand. We do not plan to have truck traffic on any of the liner system.

We appreciate your prompt feedback on the series of comments and responses and will look to receive your written approval letters at your earliest convenience. Please contact me at 253-924-3746 if you have any questions.

Sincerely,
Weyerhaeuser Company

Jennifer Hale
Environmental Manager

cc: Paul Bucholtz, MDEQ
Eileen Furey, C-14J
Michael Berkoff, SR-6J
Jim Saric, SR-6J
Erik Wilson, City of Plainwell
Kathy Huibregtse, RMT, Inc.